

FILED  
CHARLOTTE, NC

OCT 4 2024

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

US DISTRICT COURT  
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA )  
                                )  
                                DOCKET NO. 3:24-cr-198-FDW  
v. )  
                                )  
                                **FACTUAL BASIS**  
ERREN WOODSON )  
                               )  
\_\_\_\_\_

NOW COMES the United States of America, by and through Dena J. King, United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

1. On December 20, 2023, the defendant, Erren Woodson, in Mecklenburg County, within the Western District of North Carolina, did knowingly and intentionally possess with intent to distribute a detectable amount of marijuana, a Schedule I controlled substance.

2. In particular, on the aforementioned date, Charlotte-Mecklenburg Police Department(CMPD) officers conducted a search warrant at the defendant's residence in Charlotte. Officers located within the defendant's residence approximately 86 pounds of marijuana and approximately 7.6 pounds of psilocybin/psilocin mushrooms, which the defendant intended to sell and otherwise distribute.<sup>1</sup>

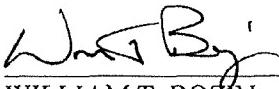
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<sup>1</sup> The approximate weight of marijuana and mushrooms includes a significant, but undetermined, amount of packaging weight; therefore, the parties agree that the appropriate Converted Drug Weight is between 20 and 40 kilograms as noted in the Plea Agreement. Assorted edible products and THC vials were also seized from the residence; these items were not tested for controlled substances and therefore not included in the drug weight.

3. During the execution of the search of the defendant's residence and property on the aforementioned date, CMPD officers also located:

- 9 firearms, including: rifles, shotguns, pistols and a revolver;<sup>2</sup>
- approximately \$586,000 in U.S. currency;
- two stolen vehicles: a 2018 Ford F150 and a 2021 Dodge Durango.

DENA J. KING  
UNITED STATES ATTORNEY

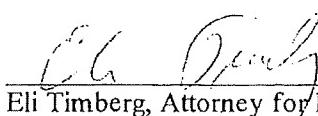
  
\_\_\_\_\_  
WILLIAM T. BOZIN and DANIEL RYAN  
ASSISTANT UNITED STATES ATTORNEYS

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis, the Bill of Information, and the plea agreement in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis, the Bill of Information, and the plea agreement. I hereby certify that the defendant does not dispute this Factual Basis.

  
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Anthony G. Scheer, Attorney for Defendant

DATED: 10/1/24

  
\_\_\_\_\_  
Eli Timberg, Attorney for Defendant

DATED: 10. 1. 24

<sup>2</sup> Defendant reserves the argument that the weapons were not possessed during and in relation to the drugs trafficking.